

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ISRAEL SANCHEZ, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTENE CORP., MICHAEL F.  
NEIDORFF, and JEFFREY A.  
SCHWANEKE,

Defendants.

Case No. 4:17-cv-00806-AGF

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR AN ORDER  
PRELIMINARILY APPROVING CLASS ACTION SETTLEMENT  
AND AUTHORIZING DISSEMINATION OF NOTICE OF SETTLEMENT**

TO: All Counsel of Record

PLEASE TAKE NOTICE that based on the Stipulation and Agreement of Settlement dated March 5, 2020 (the “Stipulation”), attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiff Louisiana Sheriffs’ Pension & Relief Fund (“Lead Plaintiff”) hereby moves this Court, under Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) approving the form and manner of giving notice of the proposed Settlement to Settlement Class Members; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel’s motion for

attorneys' fees and expenses.<sup>1</sup> The Parties' agreed-upon [Proposed] Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement Not is attached hereto as Exhibit 2. Defendants do not oppose the Motion, in accordance with the terms of the Stipulation.

Dated: March 12, 2020

Respectfully submitted,

/s/ Michael J. Flannery  
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*Counsel for Lead Plaintiff Louisiana Sheriffs' Pension & Relief Fund and Lead Counsel for the Settlement Class*

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

**KLAUSNER, KAUFMAN, JENSEN &  
LEVINSON**

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